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December 28, 2020

**Via ECF**

The Honorable Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Express Freight Systems, Inc. v. YMB Enterprises, Inc., et al.  
Case No. 20-cv-00186 (ARR) (LB)**

Dear Judge Bloom:

As you know, we represent plaintiff Express Freight Systems, Inc. ("Plaintiff") in the above action. We received defendant's counsel's December 28, 2020 letter responding to our letter filed earlier today and wish to address certain of his misrepresentations. First, Defendant's counsel is incorrect in claiming that documents cannot be scrolled through and viewed in their entirety on Zoom and must instead be printed out first. I have conducted numerous depositions on Zoom and there is a "shared screen" feature that allows the questioner to show a document on the screen for all participants to view, and the questioner can scroll through the document in its entirety. There is no reason for a party to have to print out the document in order to view it in its entirety.

Secondly, it was the undersigned who initiated the phone call to defendant's counsel in an attempt to confer and resolve this matter, but that discussion quickly proved unsuccessful as defendant's counsel has his position and is not willing to cede.

Lastly, the undersigned's prior letter from today was filed (or was in the process of being filed electronically) before the email exchange that defendant's counsel has attached to his letter took place, so it was not included with my prior letter. Nevertheless, based on defendant's counsel's unmistakable representation in that email, that the witness will only be produced via cell phone, without the ability to view documents, I have had to postpone the deposition until this matter can be addressed by the Court.

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Respectfully submitted,

FEITLIN, YOUNGMAN, KARAS &  
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/S/ Jonathan Ettman  
Jonathan M. Ettman, Esq.

cc: Levi Huebner, Esq. (via email)  
Express Freight Systems, Inc. (via email)